

Paul A. Ahearn
Director of Special Projects – Environmental

E.C.
10/13/05

Invensys.

By Certified Mail – Return Receipt Requested

October 13, 2005

Tom Turner
Associate Regional Counsel
U.S. EPA – Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, Illinois 606094



Re: RRG / Clayton Chemical Site
Von Weise Gear Company

Dear Mr. Turner:

Thank you for taking the time to speak with me earlier today regarding the U.S. EPA's September 27, 2005 General Notice Letter of Potential Liability which identified the Von Weise Gear Company in Tecumseh, Michigan ("Von Weise") as a potentially liable party for response costs in connection with the RRG / Clayton Chemical Superfund site in Sauget, Illinois. Von Weise was identified in the letter as an "Appendix B generator", i.e., one that shipped allegedly shipped between 10,000 and 75,000 gallons of hazardous waste to the site.

This letter is submitted by Invensys, Inc. (the former owner of the Von Weise) on behalf Tecumseh Products Corporation (the present owner of Von Weise) in reply to the September 27th General Notice letter and to confirm our understanding of the current situation with respect to the Site.

During our conversation, you indicated that EPA is close to reaching a final financial settlement with a large group of "Appendix A generators" (i.e., generators which allegedly shipped greater than 75,000 gallons to the site). You also indicated that once the settlement is finalized, EPA's costs with respect to the Site will be fully funded and that, at this time, the Agency does not intend to take any additional actions against the Appendix B generators that are not party to the settlement, including Von Weise.

Kindly direct any future correspondence this matter to me (instead of Von Weise or Tecumseh) at the letterhead address. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Paul A. Ahearn".

Paul A. Ahearn
Director of Special Projects – Environmental

cc: Jay S. Ehle, Esq. – Invensys
Daryl P. McDonald, Esq. – Von Weise / Tecumseh

Invensys, Inc.
33 Commercial Street, B51-2J, Foxboro Massachusetts 02035 USA
Telephone +1 508 549 4949 Facsimile +1 508 549 4653
Paul.Ahearn@ips.invensys.com